

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JESUS RAMOS,	:	
<i>Petitioner,</i>	:	
	:	No. 18-4920
v.	:	
	:	Civil Action
MELISSA HAINSWORTH, <i>et al.</i> ,	:	
<i>Respondents.</i>	:	

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE**

The Court directed the Philadelphia District Attorney's Office (DAO) to respond to this amended petition for a writ of habeas corpus within 60 days of the filing of petitioner's amended habeas petition. (*See* Order, ECF No. 25.) Because the DAO has closed due to the COVID-19 pandemic, the undersigned is working from home with limited access to the resources of the office. Thus, although the undersigned is working diligently to complete and file habeas responses and a Third Circuit brief the is due in the coming weeks, the current circumstances has slowed progress sufficiently that respondents are compelled to respectfully request a 60-day extension of time to file this response.

**WHEREFORE**, Respondents respectfully request that they be permitted an extension until June 19, 2020, to file a response to this amended petition for a writ of habeas corpus.

Respectfully submitted,

/s/ Michael Scalera

MICHAEL SCALERA

Assistant District Attorney

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JESUS RAMOS,	:	
<i>Petitioner,</i>	:	
	:	No. 18-4920
v.	:	
	:	Civil Action
MELISSA HAINSWORTH, <i>et al.</i> ,	:	
<i>Respondents.</i>	:	

**ORDER**

AND NOW, this \_\_\_\_\_ day of April, 2020, upon consideration of Respondents' motion for an extension of time to submit a response to the Amended Petition for Writ of Habeas Corpus (ECF No. 26), and for good reasons shown therein, it is hereby ORDERED that the motion is GRANTED.

Respondents shall file their response to the Amended Petition for Writ of Habeas Corpus no later than June 19, 2020.

BY THE COURT:

---

HENRY S. PERKIN  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 2020, a copy of the foregoing document was served on all counsel of record via filing on the Court's ECF system.

/s/ Michael Scalera

MICHAEL SCALERA

Assistant District Attorney